

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

IN RE:	*	
	*	
KAREN COOKSON	*	Case No.: 18-18642
Debtor	*	Chapter 13
* * * * *	*	* * * * *
BSI Financial Services, Inc.	*	
Movant	*	
v.	*	
	*	
KAREN COOKSON	*	
	*	
ROBERT THOMAS II	*	
Respondent(s)	*	
	*	
* * * * *	*	* * * * *

RESPONSE TO NOTICE OF DEFAULT

NOW COMES, Karen Cookson, Debtor/Respondent by and through her attorney, Nicholas J. Del Pizzo, III, and hereby respond to the Notice of Default and for cause states:

1. That Debtor denies the allegations in the Notice of Default.

WHEREFORE, Debtor respectfully requests a hearing be scheduled with regard to this matter.

Respectfully submitted,

/s/Nicholas J. Del Pizzo, III
Nicholas J. Del Pizzo, III, 24666
7222 Holabird Avenue
Baltimore, MD 21222
410-288-5788
email: njdelpizzo@aol.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18th day of October, 2019, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Debtors' Response to Notice of Default will be served electronically by the Court's CM/ECF system on the following:

Robert S. Thomas ECF@ch13balt.com, rthomas13@ecf.epiqsystems.com

Joshua Welborn bankruptcymd@mwc-law.com, bankruptcymd@ecf.inforuptcy.com

I HERBY FURTHER CERTIFY that on the 18th day of October, 2019, a copy of the Debtor's Response to Notice of Default was also mailed first class mail, postage prepaid to:

Office of the US Trustee
101 W. Lombard St.
Suite 2625
Baltimore, MD 21201

Karen Cookson
1249 Pekin Road
Pasadena, MD 21122

Douglas Cookson
1249 Pekin Road
Pasadena, MD 21122

/s/Nicholas J. Del Pizzo, III
Nicholas J. Del Pizzo, III